Commonwealth of Kentucky
Division for Air Quality

PERMIT STATEMENT OF BASIS

Conditional Major Final No. F-03-003R1
CONTINENTAL WEB PRESS OF KENTUCKY
125 RICHWOOD ROAD, WALTON, KY
November 9, 2007
FROUGH SHERWANI, REVIEWER
Plant I.D. # 021-015-00114

Revision 1 (Minor Revision):

On October 23 2007, the Division received an application from the source for a minor revision to their conditional major permit F-03-003.

There are three (3), 8 – Color Heatset Web 72" Offset, printing presses currently operating at the facility. The source is proposing to add one 4- Color Heatset web printing press. The proposed new press is designed to replace Emission Point # 1 (8 – Color Heatset Web 35" Offset, Printing press #1).

Thermal oxidizer, Model: 24 TMO (EP # 04) was tested on April 2006. The destruction efficiency was determined to be at 90.94% with an established temp. of 1400^0 F. The permit and Emission Inventory System has been updated accordingly.

The current source wide emission allowable for VOC is 90 tons per rolling 12-month period, 9 and 22.5 tons per rolling 12-month period for a single and combined HAPs respectively. These allowables will remain the same.

SOURCE DESCRIPTION:
Continental Web Press of Kentucky is located at 125 Richwood Road, Walton, Kentucky. This facility is in the commercial lithographic printing industry.
The source consists of three (3) 8 – Color Heatset Web offset lithographic printing presses. These printing presses' exhausts are venting to a common thermal oxidizer. Each press uses the heatset web offset lithographic printing process to transfer inked images from the plate to the impression roller then onto the paper with the aid of fountain solution and additives. The inked paper then passes through a gas-fired dryer where 80% of the ink oil is flashed off by the heat. Each printing unit is equipped with a set of ink rollers, impression roller with blanket, plate, ink fountain, and fountain solution reservoir. Each web has 4 printing units, and its own dryer. A thermal oxidizer is used to control VOC emissions.

COMMENTS:
The permit application for the renewal of permit number F-96-004 was received by this Division on September 9, 2002. Permit F-03-004 will replace the previous permit.

Type of control and efficiency:
A thermal oxidizer (Model: 24 TMO) is controlling the VOC emissions from the printing presses at the source. The thermal oxidizer shall be tested for VOC destruction efficiency. Claimed destruction efficiency is 98%.

Emission factor and their sources:
Emissions from the affected facilities were determined by engineering estimates, emission factors from AP-42, and CTG RACT for Lithographic printing.

APPLICABLE REGULATIONS:
No regulation applies to the lithographic press.

EMISSION AND OPERATING CAPS DESCRIPTION:
Continental Web Press of Kentucky has requested to keep the permit limits of less than 90.0 tons per year of volatile organic compounds (VOC), 9.0 tons per year of individual hazardous air pollutant (HAP), and 22.5 tons per year of combined HAPs to avoid major source status and RACT determination. The permittee shall demonstrate compliance through recordkeeping, and reporting requirements as listed in the permit.

PERIODIC MONITORING:
Monitoring devices will continuously indicate and record the combustion chamber temperature of the thermal oxidizer. The source shall conduct a performance test on the thermal oxidizer, during which a minimum operating temperature of the thermal oxidizer will be established.

OPERATIONAL FLEXIBILITY: NA

CREDIBLE EVIDENCE:
This permit contains provisions which require that specific test methods, monitoring or recordkeeping be used as a demonstration of compliance with permit limits. On February 24, 1997, the U.S. EPA promulgated revisions to the following federal regulations: 40 CFR Part 51, Sec. 51.212; 40 CFR Part 52, Sec. 52.12; 40 CFR Part 52, Sec. 52.30; 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12, that allow the use of credible evidence to establish compliance with applicable requirements. At the issuance of this permit, Kentucky has not incorporated these provisions in its air quality regulations.